

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,
Debtors.¹

PROMESA
Title III

No. 17 BK 3283-LTS
(Jointly Administered)

**INFORMATIVE MOTION OF THE AD HOC GROUP
OF GENERAL OBLIGATION BONDHOLDERS REGARDING
PROPOSED AMENDMENT TO THE ELEVENTH AMENDED NOTICE,
CASE MANAGEMENT AND ADMINISTRATIVE PROCEDURES**

To the Honorable United States District Court Judge Laura Taylor Swain:

The Ad Hoc Group of General Obligation Bondholders (the “GO Group”)² hereby submits this informative motion pursuant to the *Notice Regarding Proposed Amendment to the Eleventh Amended Notice, Case Management and Administrative Procedures* [ECF No. 13219] (the “Notice”) and respectfully states as follows:

¹ The Debtors in these title III cases, along with each Debtor’s respective Title III Case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19 BK 5523-LTS) (Last Four Digits of Federal Tax ID: 3801). (Title III Case numbers are listed as bankruptcy case numbers due to software limitations).

² Members of the GO Group file this informative motion exclusively on their own behalves and do not assume any fiduciary or other duties to any other creditor or person.

1. In accordance with the Court's *Memorandum Opinion and Order Regarding Motion of Official Committee of Unsecured Creditors to Amend Tenth Amended Notice, Case Management and Administrative Procedures Regarding Disclosure Requirements Pursuant to Federal Rule of Bankruptcy Procedure 2019 (Docket Entry No. 11746) and Amended Cross-Motion of Assured Guaranty Corp., Assured Guaranty Municipal Corp., Ambac Assurance Corporation, and Financial Guaranty Insurance Company (Docket Entry No. 12296)* [ECF No. 13217], the Proposed Amendments (as defined in the Notice) require certain retroactive initial reporting as of January 14, 2019 and the revision of previously-filed supplemental reports.

2. The composition of the GO Group has changed since January 14, 2019, and, as a consequence, certain entities included in supplemental reports previously filed by the GO Group are no longer members of the GO Group. Consistent with prior case management procedures,³ the GO Group requests that the Court add the following new subdivision D to the Proposed Amendments, expressly limiting retroactive disclosure requirements to the members that currently constitute the GO Group:

A Rule 2019(b) Group shall be required to make the retroactive disclosures set forth in the foregoing subdivisions IV.B and IV.C, as applicable, only with respect to those entities that were members of that Rule 2019(b) Group as of June 2, 2020.

[The remainder of this page is intentionally left blank.]

³ See, e.g., *Eleventh Amended Notice, Case Management and Administrative Procedures* [ECF No. 11885-1], ¶ IV.D.

Dated: June 2, 2020

Respectfully submitted,

/s/ Ramón Rivera Morales

J. Ramón Rivera Morales
USDC-PR Bar No. 200701

Andrés F. Picó Ramírez
USDC-PR Bar No. 302114
JIMÉNEZ, GRAFFAM & LAUSELL
P.O. Box 366104
San Juan, PR 00936
Telephone: (787) 767-1030
Facsimile: (787) 751-4068
Email: rrivera@jgl.com

/s/ Mark T. Stancil

Mark T. Stancil (admitted *pro hac vice*)
WILLKIE FARR & GALLAGHER LLP
1875 K Street, N.W.
Washington, DC 20006
Telephone: (202) 303-1133
Facsimile: (202) 303-2133
Email: mstancil@willkie.com

/s/ Andrew N. Rosenberg

Andrew N. Rosenberg (admitted *pro hac vice*)
Karen R. Zeituni (admitted *pro hac vice*)
PAUL, WEISS, RIFKIND, WHARTON
& GARRISON LLP
1285 Avenue of the Americas
New York, NY 10019
Telephone: (212) 373-3000
Email: arosenberg@paulweiss.com

/s/ Lawrence S. Robbins

Lawrence S. Robbins (admitted *pro hac vice*)
Gary A. Orseck (admitted *pro hac vice*)
Donald Burke (admitted *pro hac vice*)
ROBBINS, RUSSELL, ENGLERT, ORSECK,
UNTEREINER & SAUBER LLP
2000 K Street, N.W., 4th Floor
Washington, DC 20006
Telephone: (202) 775-4500
Facsimile: (202) 775-4510
Email: lrobbins@robbinsrussell.com

Counsel to the Ad Hoc Group of General Obligation Bondholders